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Ms. Peggy L. Jenkins  
California Air Resources Board  
Research Division, Fifth Floor  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95814

June 25, 2007

Dear Ms. Jenkins,

We at Underwriters Laboratories Inc. (UL) write to offer comment related to the Proposed Regulation Order – Regulation for Limiting Ozone Emissions From Indoor Air Cleaning Devices. These comments are specific to the status of the ozone test laboratory as a Nationally Recognized Testing Laboratory (NRTL).

Section 94805(d) of the Proposed Regulation Order states that,

“Testing of indoor air cleaning devices must be conducted by a laboratory currently recognized as an NRTL by the U.S. Occupational Safety and Health Administration (OSHA), to perform testing for the entire ANSI/UL Standard 867 or 507, where applicable.”

OSHA document, Federal Register No. 60:12980-12985 - Nationally Recognized Testing Laboratories; Clarification of the Types of Programs and Procedures allows for NRTL acceptance of test data from independent organizations. This document further provides criteria for this data acceptance.

Recognizing the implementation timeline proposed by the Air Resources Board (ARB) and the requirements of the recently issued Ozone Test Clarification, it is recommended that ARB allow for the utilization of independent test laboratories for this testing, in accordance with oversight by a NRTL as provided for by OSHA recognition.

It is the belief of UL that the utilization of independent test laboratories in conjunction with OSHA guidelines for data acceptance and ARB audits will assure that data quality is maintained.

Sincerely,

Claire A. Kammer  
Manager, Government Affairs

